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 Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

NORTHERN CALIFORNIA IBEW 595-NECA	)	
TRUST FUNDS; ELECTRICAL INDUSTRY	)	
SERVICE CORPORATION; VICTOR UNO in	)	
his capacity as Trustee of the IBEW 595 TRUST	)	No. C 06-07596 CW
FUNDS and Officer of the EISC.; and DON	)	
CAMPBELL in his capacity as Trustee of the	)	STIPULATION AND ORDER TO
IBEW 595 TRUST FUNDS and Officer of the	)	EXTEND TIME FOR FILING FIRST
EISC.;	)	AMENDED <u>COMPLAINT</u>
	)	_____
Plaintiffs,	)	
v.	)	Judge: Honorable Claudia Wilken
	)	
MRM ELECTRICAL COMMUNICATIONS,	)	
INC., a California corporation; MRM-VAN	)	
HOOK, a Joint Venture; PLATTE RIVER	)	
INSURANCE COMPANY, a Nebraska	)	
corporation; ISI CONTROLS LTD. d/b/a	)	
METROPLEX CONTROL SYSTEMS, a	)	
Partnership; INSURANCE COMPANY OF	)	
THE WEST, a California corporation; HENSEL	)	
PHELPS CONSTRUCTION COMPANY, a	)	
Delaware corporation; TRAVELERS	)	
CASUALTY & SURETY COMPANY OF	)	
AMERICA, a Connecticut corporation; and	)	
FIDELITY & DEPOSIT COMPANY OF	)	
MARYLAND, INC., an Illinois corporation; and	)	
DOES 1 through 10, inclusive,	)	
	)	
Defendants.	)	
_____	)	

WHEREAS, on March 27, 2007, the parties reached an agreement to resolve all claims in this case; however, formal agreements and releases are still pending. The parties anticipate that the settlement will be finalized within the next two weeks with dismissals to be filed soon thereafter;

WHEREAS, on March 28, 2007, the Court granted the parties' previously filed Stipulation and Order allowing Plaintiffs to file a First Amended Complaint, and further ordered the filing of the First Amended Complaint within 3 days from March 28, 2007; and

WHEREAS, the parties conferred regarding extending the time for filing the First Amended Complaint in light of their recent agreement to resolve the claims in this case and have agreed to stipulate to extend the filing date of the amended pleading, if necessary, until three days following the Plaintiffs' notification to the Court that the claims in this matter have not been resolved.

NOW THEREFORE, IT IS AGREED AND STIPULATED that the time for filing Plaintiffs' First Amended Complaint shall be extended until three days following the Plaintiffs' notification to the Court that the claims in this matter have not been resolved.

DATED: March 30, 2007

The respective attorneys, by their signatures below, represent and warrant that they have the consent of their respective clients, have discussed this Stipulation and [Proposed] Order to Extend Time for Filing First Amended Complaint and have the authority to bind their respective clients.

Respectfully submitted,

DATED: March 30, 2007

**LEONARD CARDER, LLP**

By:                     /s/                      
CHRISTINE S. HWANG  
Attorneys for Plaintiffs

DATED: March 30, 2007

**SWEENEY, MASON, WILSON  
& BOSOMWORTH**

By:                     /s/                      
ROGER MASON  
Attorneys for Defendants MRM, MRM Van Hook,  
Platte River Insurance Company

DATED: March 30, 2007

**DHILLON & SMITH**

By:                     /s/                      
HAROLD P. SMITH  
Attorneys for Defendants ISI Controls Ltd. dba  
Metroplex Controls Systems and Insurance  
Company of the West

DATED: March 30, 2007

**RICHARDSON & WILHELMY**

By:                     /s/                      
ALAN J. WILHELMY  
Attorneys for Defendants Hensel Phelps  
Construction Corp. and Travelers Casualty &  
Surety of America

I, Christine S. Hwang, hereby attest, pursuant to N.D. Cal. General Order No. 45, that the concurrence to the filing of this document has been obtained from each signatory hereto.

                    /s/                      
CHRISTINE S. HWANG  
Attorney for Plaintiffs

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED:   4/9/07  



HON. CLAUDIA WILKEN  
United States District Judge